

Deposition of Peter Koconis - September 21, 2015

1 IN THE UNITED STATES DISTRICT COURT

2 NORTHERN DISTRICT OF ILLINOIS

3 EASTERN DIVISION

4 SHANNON SPALDING AND DANIEL)

5 ECHEVERRIA,)

6 Plaintiffs,)

7 v.) No. 12 cv 8777

8 CITY OF CHICAGO, et al.,)

9 Defendants.)

**CERTIFIED
TRANSCRIPT**

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11 The deposition of PETER KOCONIS, called
12 by the Defendants for examination, taken pursuant
13 to notice and pursuant to the Federal Rules of
14 Civil Procedure for the United States District
15 Courts pertaining to the taking of depositions,
16 taken before Loretta A. Tyska, Certified
17 Shorthand Reporter and Registered Professional
18 Reporter, at 191 North Wacker Drive, Suite 3700,
19 Chicago, Illinois, commencing at 1:30 p.m. on
20 21st day of September, 2015.

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1 APPEARANCES:

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16 On behalf of the Defendants.

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2 PETER KOCONIS

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3 Direct Examination by Ms. Davis

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5 E X H I B I T S

6 NO.

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7 Koconis Exhibit 1

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1 (Witness sworn.)

2 MS. DAVIS: Let the record reflect that this
3 is the discovery deposition of Peter Koconis
4 taken pursuant to notice and agreement of the
5 parties, pursuant to all the applicable rules,
6 Federal Rules of Civil Procedure, and the Federal
7 Rules of Evidence.

8 PETER KOCONIS,

9 a witness, having been first administered an
10 oath, was examined and testified as follows:

11 DIRECT EXAMINATION

12 BY MS. DAVIS:

13 Q Will you state your name for the
14 record.

15 A Peter Koconis.

16 Q Mr. Koconis, I know you've taken a
17 deposition before.

18 A Yes, just a couple hours ago.

19 Q Exactly. But let me just give you my
20 real quick ground rules. Please don't speak when
21 I'm speaking. I will try to let you finish your
22 answer before I ask you another question. If at
23 any point you don't understand my question, then
24 let me know. I will repeat it or rephrase it.

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1 If you answer the question, I will assume you
2 understood the question. Do you understand?

3 A Yes, ma'am.

4 Q Anytime you need a break, let me know.

5 This is not meant to be torture. If you need to
6 take a break, let me know. We can do that. Just
7 please don't ask for a break while a question is
8 pending. After you've fully answered a question,
9 feel free to take a break at any time after that.

10 A Yes, ma'am.

11 Q And all your responses have to be
12 verbal; yes, no. She can't take down shakes of
13 the head or shrugs of the shoulders. Even though
14 we all do that from time to time, make sure we
15 have verbal responses. Okay?

16 A Yes.

17 Q Can I get your brief background? Can
18 I get your address?

19 A 1423 West Glen Lake, Chicago,
20 Illinois, 60660.

21 Q And how long have you lived there?

22 A On and off 60 years.

23 Q I wouldn't have even thought you were
24 60 years old.

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1 A I'm 69.

2 Q I guess I should say, "Off the
3 record," but on the record, you look good for
4 69 years old.

5 A Yes.

6 Q Who do you live there with?

7 A My wife and my dog. In that order,
8 usually.

9 Q Are you currently employed?

10 A No.

11 Q Who was your last employer?

12 A Somebody who paid me to do work?

13 Q Yes.

14 A Touch Vision.

15 Q And when were you there?

16 A All of last year.

17 Q So 2014?

18 A 2014, part of 2015.

19 Q And what did you do there?

20 A I was on-air personality that
21 commented on police policy and procedures.

22 Q Then prior to Touch Vision, where did
23 you work prior to that?

24 A Chicago Police Department for

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1 38 years.

2 Q When did you start at the Chicago
3 Police Department?

4 A October 25, 1971.

5 Q And can you briefly tell me in your
6 time at the CPD what division you were in?

7 A I started in the patrol division; then
8 I went to major accident investigation section;
9 then I was assigned to the Illinois Attorney
10 General's office as a department chief of
11 investigations; then I came back to the police
12 department and went to the Internal Affairs
13 division.

14 Q Around what year did you go to IAD?

15 A Mid eighties. Then while there, I was
16 promoted to agent, which is a detective. Then I
17 was promoted to sergeant.

18 Q Do you remember approximately when you
19 were promoted to sergeant?

20 A 1999. Then I went to the Chicago
21 Housing Authority transition team where we
22 decertified the Chicago Housing Authority Police
23 Department because of corruption and brought in
24 the Chicago Police Department. And then I stayed

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1 in IAD until roughly 2004, 2005; left there and
2 went back to patrol and worked gangs and
3 tactical.

4 Q So in approximately 2005, you went
5 back again to tactical?

6 A In the 24th Police District.

7 Q And did you stayed there until --

8 A Well, I retired. And then Jody Weis
9 asked to meet me for lunch. And then he asked me
10 to unretire and come back to work as a special
11 assistant to his office, and I did. And I only
12 lasted 27 days because we -- I just -- I wanted
13 to be retired. I didn't want to work.

14 Q Understood. And that last time when
15 you came back in for those 27 days, that would
16 have been approximately when, what year?

17 A 2009. He convinced me that I should
18 come back. My only job there was to get the feel
19 of the police on the street and why there was
20 this adverse reaction to him. And he basically
21 was a good man. And he just came on too strong.
22 And there was no need for me to stay there. And
23 it was summertime and I wanted to play golf and I
24 just said, "Thank you very much; I'm too old. I

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1 want to quit."

2 Q And between 2009 and when you were
3 working at Touch Vision in 2014, were you
4 employed anywhere?

5 A No.

6 Q You were just enjoying retirement?

7 A Yes, I was.

8 Q Can you tell me approximately how many
9 times you've been deposed in the past?

10 A I don't know. I really don't.

11 Q Would you say it was more than ten?

12 A Oh, yeah.

13 Q Would you say it was more than 20?

14 A Yes.

15 Q More than 30?

16 A In all my case? Oh, my gosh.

17 Probably. I would say probably.

18 Q Do you think it's more than 50?

19 A No.

20 Q So somewhere between 30 and 50?

21 A Right.

22 Q And in those times, have you always
23 been on one side or the other -- Let me strike
24 that.

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1 When you've been deposed, have you
2 been the plaintiff in any of those cases?

3 A What do you mean?

4 Q Let me go back. In what capacity have
5 you had your deposition taken; were you a witness
6 or an expert?

7 A Right. I was an expert in some. And
8 I was in accident reconstruction and reckless
9 homicides. I was accepted as an expert witness.
10 Then in a mediation I was accepted as an expert
11 witness in IAD procedures. And one time I had
12 been -- I was an expert for the police
13 department, and another time I was an expert
14 against the police department in an
15 investigation.

16 Q Can you tell me --

17 A Does that make sense?

18 Q Yeah, it does. I just want to kind of
19 get a little bit more understanding. Can you
20 tell me approximately how many times you've
21 testified against the police department?

22 A Once.

23 Q And what was the nature of that case?

24 A A man was promoted to captain, and

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1 they -- he was found to be in an illegal
2 establishment that was selling liquor. They
3 tried to -- he was an African-American. They
4 tried to demote him. So his law firm called me
5 to review the internal affairs file to its
6 accuracy and its proper conclusion. And I did,
7 and I disagreed with their findings, and the man
8 eventually was restored to his rank.

9 Q And so in all the other cases that you
10 have -- I'm sorry?

11 A The law firm was "Coosis". Is that
12 his name? Yeah. That was who represented the
13 captain. He was the lieutenant captain union
14 lawyer or something.

15 Q And all the other cases where you've
16 been deposed, were you then testifying on behalf
17 of the police department?

18 A Yes.

19 Q And in this case what did you do to
20 prepare for this deposition?

21 A Nothing. They just told me about it.

22 Q Did you review any documents?

23 A No. He was going to send them to me,
24 but he didn't.

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1 Q Have you reviewed anybody else's
2 deposition transcript?

3 A No.

4 Q So it's fair for me to say you've
5 reviewed no emails, no deposition transcripts,
6 nothing?

7 A No. Yeah, I mean, that's right.

8 That's right for you to say.

9 Q Did you talk to anybody in preparation
10 for this deposition?

11 A Him to tell me that we were going to
12 be here. I was told by --

13 Q Hold on. Let me make sure of
14 something. Are you represented by Mr. Smith?

15 A No.

16 Q Or by Mr. Taren in this case?

17 A Who?

18 Q His partner who is helping with this
19 case?

20 A No.

21 Q Okay. So he's not your lawyer?

22 A No. I don't think I need one. I'm
23 not being sued, am I?

24 Q So I just want to make sure. I was

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1 just going to ask you who you've talked to.

2 A Loevy and Loevy's lawyer, this -- I
3 talked to this Heather. She had a baby, so then
4 this Cindy called me. You guys made appointments
5 for me to come, and then kept canceling them and
6 screwing me over. So then finally they got in
7 touch with me and said we're going to do your
8 deposition Monday morning. I said fine. Then I
9 got a message, call me. I call her. She says
10 they're going to try to do another one in the
11 afternoon. So then I go, well, who is who and
12 what's what? And then they told me. And then
13 Chris called me and said we're going to do yours.
14 We're going to try to do them both in one day.

15 Q Okay. Understood. So besides the
16 conversation you had with Chris about that, did
17 you have any other conversations with anybody
18 about this upcoming deposition?

19 A No.

20 Q Do you know Shannon Spalding?

21 A I know her, yes.

22 Q And how do you know Shannon Spalding?

23 A Oh, boy. Should I start with the
24 beginning?

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1 Q You know what? I'm going to ask you a
2 few more background questions before we jump into
3 Shannon.

4 A Okay.

5 Q Where did you go to high school?

6 A St. George in Evanston.

7 Q What year did you graduate?

8 A 1964.

9 Q Did you have any degrees? Let me go
10 back. Do you have any degrees or certificates?

11 A Yeah, from the police department. I
12 got a junior college degree. I have certificates
13 from the police department continuing
14 investigation and continuing education in
15 investigations and interrogation techniques from
16 Northwestern University. The traffic institute.
17 I did that for -- I went there for a year. Then
18 I was detailed to teach accident reconstruction,
19 reckless homicide, vehicular homicide classes to
20 police department members to states attorneys and
21 district attorneys from around the country. I
22 lectured at some colleges regarding police
23 policies and procedures, disciplinary process. I
24 think that's about it.

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1 Q While you were in the Chicago Police
2 Department, were you disciplined for any reason?

3 A No.

4 Q Did you have any CRs against you?

5 A Yes.

6 Q How many?

7 A In my years, probably a half dozen.

8 And none of them were sustained.

9 Q And of the half dozen that you had,
10 what were they for?

11 A Allegations of -- God, you know what?
12 I honestly -- they were so long ago. They were
13 when I was young. The only one I remember is the
14 last one where I suspended an officer because he
15 was caught perjuring himself in a case. And the
16 deputy superintendent in charge of internal
17 affairs wanted me to change my finding that he
18 should be fired to giving him 30 days. I refused
19 because the policy of the department is if you as
20 my supervisor disagree with my findings, you do a
21 cover sheet. In that cover sheet you explain why
22 my findings should not be adhered to and your
23 recommendations and why you made those
24 recommendations.

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1 When this deputy superintendent could
2 not get me to do it because this officer was
3 politically connected, I refused, and that's when
4 I went to transfer out of the division because I
5 wouldn't work for her. Then she tried to get
6 me -- to suspend me for two days for not getting
7 a CR number on somebody. And I went to -- I
8 immediately filed a grievance, went to
9 arbitration, and the arbitrator in the ruling
10 said the officer who made the complaint against
11 me should be the one that should be suspended and
12 that I should be made whole. So I was exonerated
13 in that. And I should say in most of those CR
14 numbers I was exonerated, and it wasn't just
15 not sustained, it was proven I was, in fact,
16 right.

17 Q And besides that one, do you remember
18 what any of the other ones were about at this
19 point?

20 A No. Most of them had to do with
21 arrests.

22 Q Have you taken any leaves of absence
23 from the department at any time during your
24 career?

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1 A Yes. I took one leave.

2 Q And what was that for?

3 A That's personal. Do I have to answer
4 that?

5 Q Let me put it like this: I'm not
6 trying to get into the nitty gritty. If you say
7 it's personal, that's fine. I'm just trying to
8 get a gist of what it was about.

9 A It was regarding the health of my
10 mother and brother.

11 Q That's good enough.

12 A My brother is severely handicapped,
13 and I've been taking care of him since I've been
14 22. My father was murdered, and I got the -- I
15 had to take care of my brother and my mother. I
16 had to take a leave of absence, take a job that
17 paid more just for a year until I could get
18 everything settled, and then went back to the
19 police department.

20 Q Thank you for that.

21 Do you have any grievances or lawsuits
22 pending with the city right now?

23 A No. As a matter of fact, they gave me
24 money back for my tire that was ruined in a

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1 pothole. That was the only one.

2 Q So you have no cases or arbitrations
3 or anything like that pending?

4 A No.

5 Q With the city or anybody else?

6 A No.

7 Q All right. Now that I've got all that
8 preliminary out of the way, let's go back to
9 Shannon Spalding. And how do you know Shannon?

10 A Oh, boy. A lieutenant on the police
11 department named Karyn Murphy, she's now a
12 captain -- she worked in the Office of the
13 Superintendent. She and Shannon Spalding were
14 friends. Shannon Spalding came to her and told
15 her what was going on regarding her involvement
16 in an investigation that involved -- that turned
17 out to involve policemen.

18 So Shannon had told this lieutenant
19 that her lieutenant wouldn't get a CR number. So
20 she went to Murphy. Murphy then says, "Well, I'm
21 not going to get the CR number." So both of them
22 technically broke the rules. So then Murphy
23 says, "These kids have got a problem. They need
24 some advice on IAD policy and procedures; would

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1 you talk to them?"

2 And I told her, you know, "You got to
3 get a CR number. That's not for me. I don't do
4 that. I'm not working."

5 So she understood it, and she gave
6 Shannon my phone number. And then Shannon called
7 me, and I met them.

8 Q So approximately when was it that
9 Shannon called you?

10 A It's got to be four years ago.

11 Q I'm not expecting you to remember
12 exact dates; I'm just trying to get years.

13 A Yeah, three to four years ago.

14 Q And when she contacted you, did she
15 call you on the phone?

16 A Yes.

17 Q And was she on the phone by herself or
18 was anybody else on the phone with her?

19 A No. And she says, "I'm a friend of
20 Karyn Murphy's. We're having problems. We were
21 doing an investigation, and during the course of
22 the investigation, we've discovered that there
23 were some police officers involved. And when we
24 went to report it, nobody would do anything. And

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1 can you help me and tell me what we should do?"

2 Q And during that conversation, what did
3 you tell her?

4 A I said, you know, we got to talk, you
5 know, in person.

6 Q So during that conversation you didn't
7 go into the details of the situation?

8 A No.

9 Q And then did you eventually meet in
10 person?

11 A Yes.

12 Q When did you meet in person?

13 A A day or two after that phone call we
14 met at a restaurant on 21st or 22nd Street, and I
15 can't remember the name of it. We've been there
16 a million times.

17 Q 21st or 22nd and what?

18 A What's the Italian restaurant over
19 there that serves good food?

20 Q Because I may want to go.

21 A It's great. Honestly, I can't
22 remember the name of it, but it has everything:
23 pizza, spaghetti, whatever.

24 Q So you met at an Italian restaurant?

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1 A We met at a restaurant, yes.

2 Q Was it just you and her?

3 A It was me, Tony -- me -- Wait a
4 minute. It was Shannon, Tony, and Danny.

5 Q Who is Tony?

6 A Tony is Tony Hernandez, Shannon's
7 boyfriend.

8 Q So Shannon, Tony Hernandez her
9 boyfriend?

10 A And Danny, who was her partner.

11 Q Danny Echeverria?

12 A Yes.

13 Q And you, obviously?

14 A Yes.

15 Q And what was said during that
16 conversation? Let me go back. How long did you
17 guys meet?

18 A Oh, there were a couple hours.

19 Q And over the course of that couple
20 hours, let me just start first with Shannon.

21 What did Shannon tell you?

22 A Shannon told me they were working on a
23 federal task force and it involved gangs and
24 drugs. And during the course of that

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1 investigation --

2 MS. DAVIS: Can we take a pause for a
3 second?

4 (A short recess was had.)

5 BY THE WITNESS:

6 A They discovered that there were police
7 officers that could have been involved in drug
8 rip-offs and drug sales. And she mentioned one
9 of the names, and I recognized the name from
10 being in internal affairs, this guy Watts who was
11 a sergeant. And he came up long time ago when I
12 was in the CHA transition team in 1999 as a
13 corrupt cop. He was ripping off drug dealers and
14 selling drugs. So that piqued my interest. And
15 then she went on to say what their part was and
16 that they attempted to get a CR number and they
17 couldn't, and the person they went to wouldn't
18 get it. And eventually she went to Juan Rivera
19 and basically forced his hand to get the
20 complaint.

21 Now, also involved in this, Tony
22 Hernandez has a separate thing going while in
23 narcotics with his sergeant who falsified
24 department records and payroll and changed time

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1 and attendance sheets and everything else, so
2 there were two things going at the time.

3 Q And so Shannon told you that, and
4 what, if anything, did Danny Echeverria say?

5 A Well, he didn't say much.

6 Q Did he say anything in the course of
7 the conversation?

8 A I mean, yeah. He said they had an
9 informant. They called him Chewbacca. I mean,
10 he was a guy that was an informant that the feds
11 planted dope and money on so that he could get
12 ripped off. And he was their informant. And
13 that's what led to Watts getting caught because
14 Watts stole money from him. So that was Danny
15 and Shannon, because Tony worked with somebody
16 else. Danny and Shannon worked together.

17 And they talked about this -- you
18 know, they were assigned to -- I think it's 543
19 which is detached services where you're lent to
20 another unit, in this case the federal
21 government. And they were working for an FBI
22 agent, and they had gathered all this
23 documentation and evidence on this case. They
24 had set up a drug house where the money would be

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1 ripped off. And unfortunately the FBI found that
2 the agent himself was corrupt and stole some
3 money, and that hurt the original investigation.
4 So it was like part of the investigation had to
5 be put aside because of the corruption of this
6 FBI agent. And then it had to go forward from
7 this certain spot. And Watts and this guy
8 Kallatt Mohammed both pled guilty to the home
9 invasions and the rip-offs and the drugs things
10 and both went to jail. That's it in a little bit
11 of a nutshell.

12 Q Understood. During the course of your
13 conversation, did Tony Hernandez say anything
14 about Shannon and Danny's situation?

15 A No.

16 Q He was just talking about his
17 situation?

18 A Well, he wanted to know what with
19 getting ripped off and the changing of all this
20 stuff what he had to do.

21 Q And what, if anything, did you advise
22 or tell Shannon and Danny that they should do?

23 A Well, that they had to get -- they had
24 to get a separate investigation or a CR

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1 investigation initiated regarding what happened
2 to them because after this, they were -- from my
3 understanding, Juan Rivera had let out his -- had
4 revealed their names to the commander or the
5 deputy in charge of organized crime and the
6 commander of narcotics, O'Grady and Roti or
7 something like that. O'Grady was one guy; Roti
8 was another. Now their names being out there,
9 their identity has been compromised. Which every
10 undercover investigation that I did when I was in
11 confidential, the last thing you wanted anybody
12 to know was who you were or what you were working
13 on. Because if you worked on corrupt policemen,
14 you could get hurt.

15 Q During the course of the conversation
16 that you had with them over this course of a
17 couple hours, is there anything else that they
18 told you in specifics about specific acts of
19 retaliation or specific people who were
20 retaliating against them or anything like that?

21 A The initial two hours was like a
22 feeling out period for me to see if I was even
23 going to waste my time helping them. And so we
24 had more than one meeting, you know, at different

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1 restaurants. And they even came to my house once
2 and we sat down and talked. The reason being is
3 I wanted to hear her tell me this story more than
4 once and as many times as I could because as a
5 policeman and an investigator, if somebody is
6 lying, they're going to get tripped up. And I
7 found she was straight on line or on point every
8 time I talked to her. Sometimes you have to slap
9 her to shut her up. But she just was --
10 everything was on point.

11 And then I said, you know, in my mind,
12 I said she's telling the truth. And so I said,
13 you know, I'll advise you. I'll help you. And I
14 told them to get a lawyer.

15 Q And you told them to get a lawyer on
16 that first meeting?

17 A Yeah. I told him you've got to get a
18 lawyer because he handles stuff -- well, I don't
19 know -- he was somehow -- there was lawyers
20 before him. But I just said you got to get legal
21 advice.

22 Q All right. And so I want to kind of
23 walk through those conversations. The first
24 conversation took a couple hours; you just told

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1 me what that conversation was about. When was
2 the next conversation?

3 A Probably a couple weeks later.

4 Q And where was that held?

5 A I think at the same restaurant.

6 Q And who was there?

7 A The three of them: Tony, Danny, and,
8 Shannon.

9 Q How long did you guys meet this time?

10 A Probably another two hours.

11 Q And approximately when would that have
12 been? Approximate because I don't know if I
13 asked you the last one.

14 A This was within a few weeks of them
15 filing their CR numbers, getting dumped from
16 their positions, getting moved around the
17 department, put in an office with nothing to do,
18 you know. At that point it started to get --
19 initially it just seemed that the hostile work
20 environment -- that's the term I'll use -- that
21 was getting worse and worse and worse.

22 Q This was approximately when, the
23 second conversation?

24 A A couple weeks after the first.

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1 Q When would have been --

2 A Because I made some phone calls to
3 find out are these coppers good coppers? What's
4 the story? I asked people that knew them. You
5 know because if they were useless nothings, I
6 wouldn't even waste my time.

7 Q What month, what year was your first
8 meeting?

9 A I believe 2011, and I could not tell
10 you the month.

11 Q Okay. Approximately 2011?

12 A I know it was cold.

13 Q Well, it's Chicago.

14 A Yes, I know.

15 Q That's fine. And then the second
16 meeting was approximately two weeks after that?

17 A Two weeks later, yeah.

18 Q So still cold outside in approximately
19 2011?

20 A Yes.

21 Q Now, before we get to the
22 conversation, you said you had made a few calls
23 about them. Who did you call about them?

24 A I just called -- Tony worked in 24

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1 when I was there. I didn't have any idea who he
2 was. So I asked, you know, a couple of coppers,
3 you know, that worked for me. "Do you know this
4 guy?" "Yeah." "Was he a good policeman?"
5 "Yeah."

6 Then I called a couple people that I
7 knew that were in narcotics, people that worked
8 for me and transferred to narcotics. And I said
9 you know -- yeah, were they good workers? Yeah.
10 Were they on the legit, meaning were they honest?
11 Yeah.

12 Q Who were these people you talked to?

13 A I don't have any idea now. This was
14 four years ago. But they were all policeman that
15 worked for me or I worked with.

16 Q As we sit here today, can you think of
17 the names of any of the people you talked to?

18 A No. Sorry.

19 Q If any come back to you while we're
20 having this deposition, just let me know.

21 So that second conversation, couple of
22 hours. Same people were there, Shannon, Tony
23 Hernandez and Danny Echeverria. And what did
24 you -- I'm going to kind of go through the same

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1 thing. What did Shannon say?

2 A I believe at this meeting at this time
3 they explained to me that -- well, Danny and
4 Shannon, because Tony -- Tony was just there
5 because this was -- Now we're talking about Danny
6 and Shannon, because Tony's case was rather cut
7 and dry. This guy cheated him and did this,
8 boom, it's over.

9 These two, though, were -- they were
10 assigned -- they were assigned to auditing and
11 internal control, which working for a lieutenant
12 named Pascua, Debbie Pascua. And she had said
13 something to the effect of, "I know you're here.
14 I know you're rats. And you're going to be
15 sitting here and you're going to just sit by
16 those phones, and that's all you're going to do,
17 just sit here."

18 And at one time they were assigned to
19 the training division, and they just sat in a
20 little cubicle with phones with nothing to do.
21 And at that point she thought they're obviously
22 out to get me or this is my punishment for doing
23 my job. And so we went from auditing and
24 internal control to training division. She was

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1 then -- Tony was taken off his team. They were
2 taken off their team. They were separated. Boy,
3 this is hard to remember all this stuff.

4 O'Grady had called her an IAD rat. At
5 rollcall they were told the other officers were
6 told by their supervisors that these two were IAD
7 rats when, in fact, they were never in the IAD.
8 Lost my train of thought. They were -- Can you
9 pause for a minute?

10 Q Sure.

11 A I have to think this in my head.

12 Q Okay.

13 A Okay. So then they were -- Danny was
14 still working. And policemen had told him that
15 they had to be careful because the bosses were
16 out to get him and that he shouldn't associate
17 with Shannon because she was the one that was
18 causing all this problem. And O'Grady had given
19 instructions to his lieutenants and his sergeants
20 that he didn't want them to be assigned any
21 cases, to be assigned anything; and that he at
22 one point band her from the building, the Homan
23 Square building where she has a locker.

24 And I found this to be troubling

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1 because O'Grady himself worked in the internal
2 affairs division. And then I found out that he
3 denied to everyone that he was ever in the IAD.
4 And I know for a fact he was in the IAD because
5 his office was right across the hall from my
6 office. He was going to law school, and he was
7 assigned to the IAD to make his schedule easier
8 to go to school. So he out and out lied to
9 everybody. And then finally he admitted to
10 somebody that he was, in fact, assigned to the
11 internal affairs division.

12 And he should have known, him being a
13 boss, him be a supervisor, him being a commander,
14 he should have been aware of the rules and
15 regulations regarding EEOC problems, hostile work
16 environment, harassment. And he as the commander
17 should have put a stop to it.

18 Q So you guys talked about that during
19 that conversation at the restaurant the second
20 time, right?

21 A Yes. And I told them this is what you
22 have -- you have to get to somebody -- you have
23 to voice your displeasure and get somebody to
24 take up your cause. And I remember making a call

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1 to a Beatrice Cuello, Bea Cuello. We worked
2 together on that CHA transition team, and she was
3 one of the first deputy superintendents.

4 Q Was that right after this
5 conversation?

6 A No. I think this was sometime during
7 this period of where I'm trying to figure out if
8 these kids are telling the truth. And you asked
9 if I talked to anybody? She's the one that I
10 called.

11 And I said, "Do you know Echeverria
12 and Spalding?"

13 And she said, "Yeah, I know them. And
14 I find them to be good officers. I don't know
15 why everybody is messing with them."

16 She then went and talked to the other
17 first deputy. His name was Jackson. And he said
18 that Roti and O'Grady said that they were IAD
19 rats and that they were not welcome back in
20 narcotics section. Because once you're taken
21 from your -- you're assigned to detach services,
22 once you're out of detach services, you go back
23 to your original unit. And they were supposed to
24 go back to narcotics. And that's when Roti and

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1 O'Grady called them rats and said we don't want
2 them back.

3 So my timeline might be mixed up, but
4 you'll eventually get it. Right? Does that make
5 sense?

6 Q Let me go back to a few things that
7 you just said.

8 A Sorry.

9 Q So you said that apparently Debbie
10 Pascua had called Shannon and Danny rats?

11 A IAD rats, yeah.

12 Q Did you ever talk to Debbie Pascua
13 about that?

14 A No.

15 Q Do you have any firsthand knowledge
16 that that's what Debbie said?

17 A No, I do not.

18 Q So this is what Shannon and Danny told
19 you that she said?

20 A Yes.

21 Q As it relates to the -- so O'Grady
22 having called them IAD rats at rollcall, is that
23 something that Danny and Shannon told you?

24 A Yes. They had been told by other

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1 officers.

2 Q Did Danny and Shannon claim to have
3 heard that?

4 A From other people.

5 Q From other people?

6 A But Bea Cuello, she said that they
7 said they were IAD rats and didn't want them
8 back.

9 Q I just want to go back to what we were
10 talking about. So as it relates to O'Grady, do
11 you have any firsthand knowledge about O'Grady
12 ever calling Danny and Shannon rats, IAD rats?

13 A No.

14 Q Do you know if -- did the names of
15 anybody who was present at that rollcall where
16 O'Grady allegedly called them IAD rats would have
17 come up, the names of any people come up?

18 A They mentioned sergeants and a
19 lieutenant. I don't know who they were. I mean,
20 they mentioned their names, and I don't know who
21 they are.

22 Q So Danny and Shannon told you the
23 names of those folks, but you don't remember who
24 they were?

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1 A Padar being one. He was one.

2 Q So Padar was one would have been one.

3 People at rollcall --

4 A Well, he was Tony's sergeant.

5 Q I just want to be clear for the
6 record.

7 A Okay.

8 Q Padar would have been one of the
9 people at the rollcall when O'Grady allegedly
10 called them IAD rats?

11 A It wasn't rollcall; he told. The
12 understanding I got, he told his supervisors that
13 these two people were IAD rats and everybody had
14 to be careful. Then his supervisors, lieutenant
15 would go to the sergeants and tell the sergeants,
16 and then the sergeant would disseminate the
17 information to the patrolmen. So the commander
18 would not go to all the patrolmen in narcotics
19 and have a big meeting and say they are IAD rats.
20 He would tell his lieutenants, his lieutenants
21 would tell their sergeants, and their sergeants
22 would say this stuff.

23 Q Understood. Beside Padar, do you know
24 the names of any of the other sergeants or

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1 patrolmen or anybody else who came up during that
2 conversation who would have heard them referred
3 to as rats?

4 A There's a lieutenant named Cesario. I
5 don't know what his position was there. He's a
6 commander now. And another Hispanic lieutenant
7 that was there that they originally tried to talk
8 to who said, "I'm not getting involved."

9 Q And you don't know what his name is?

10 A I don't know the guy's name.

11 Q But you know he's a Hispanic
12 lieutenant?

13 A Right. Because I thought his name was
14 Hispanic.

15 Q Last name. Okay.

16 I'm trying to read my notes. In terms
17 of the policeman who told Danny not to associate
18 with Shannon, do you recall who that was person
19 was?

20 A These were officers that worked with
21 Danny on Danny's team in narcotics.

22 Q Okay. And as we sit here now, do you
23 know the names of any of those people?

24 A No. I don't think he ever mentioned

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1 them.

2 Q During the conversation you don't
3 recall Danny telling you the names of those folks
4 who told you?

5 A No. He just said cops that worked
6 with him.

7 Q Let me finish. You don't recall
8 during that conversation Danny telling you the
9 names of any of the policemen who told him not to
10 associate with Shannon?

11 A No.

12 Q Now, as for instructions being given
13 for them not to be assigned to cases, you said a
14 few minutes earlier that it's your understanding
15 that O'Grady gave those instructions for them not
16 to be assigned to cases. Is that what you were
17 told during that meeting?

18 A One of those meetings, yes.

19 Q Did you have the opportunity to verify
20 that or check that with anyone?

21 A No. It wasn't my job to do.

22 Q Do you know James O'Grady?

23 A He worked in the IAD, yeah. I met
24 him. I know who he is. I've talked to him. But

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1 I haven't talked to him since, I don't know, 15,
2 18 years.

3 Q And you never talked to him about
4 Shannon Spalding or Danny Echeverria?

5 A No.

6 Q So any of the things that you have
7 testified to today about what James O'Grady was
8 involved in or said or anything of those kind of
9 things come directly from Shannon and Danny; is
10 that right?

11 A Some do. Other issues with O'Grady
12 came from other people just in the course of
13 conversations.

14 Q Can you give me the names of some of
15 those other people who mentioned James O'Grady
16 during the course of conversations?

17 A I was at a big lunch, and then they
18 were talking about O'Grady had used a phony
19 address so his kids could go to school in Park
20 Ridge, and they thought that that was -- that's
21 obviously a violation of the rules and the law.
22 And I go, why didn't anybody do anything?

23 Q Let me go back. I guess I should have
24 formed the question a little better. I'm really

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1 just talking about as it relates to the
2 allegations made by Shannon and Danny as it
3 relates to their case.

4 A Okay.

5 Q If the information that you have
6 regarding O'Grady as it relates to Shannon and
7 Danny's case, all that information came from
8 Danny and Shannon; is that right?

9 A Yes, I believe so.

10 Q Now, let's go back to the conversation
11 with Bea Cuello? Now, when exactly -- not
12 exactly, but to the extent you know month, date,
13 when did that conversation happen?

14 A After I first got contacted by Murphy
15 and Shannon and they told me all this stuff,
16 within a few days I reached out and called
17 Beatrice. And I said do you know these two
18 officers and is there a problem with them?
19 Because if she would have said yes, they're no
20 good, whatever, I wouldn't have been involved in
21 this at all. But she said to her knowledge and
22 her understanding of them they were two good
23 officers. She doesn't understand why what's
24 happening to them happened.

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1 And then she made an inquiry and found
2 out that Jackson, who was the first deputy --
3 There were two first deputies: Beatrice and
4 Jackson. Jackson, Roti, and O'Grady had said to
5 the first deputy, "We don't want them back.
6 They're IAD rats."

7 Q Now, how do you know Bea?

8 A I met Beatrice on the job in the
9 nineties, and I find her to be honest,
10 articulate, and a very, very bright woman.

11 Q Did you guys worked together in the
12 nineties?

13 A I worked on the CHA team. She was a
14 sergeant. I was a sergeant. There were a couple
15 more. And she was more of a tactical technical
16 advisor, where I was second in charge of
17 corruption investigation in the CHA. She had the
18 much harder job.

19 Q And this conversation that you had
20 with her, with Beatrice, was over the phone?

21 A Yes.

22 Q And did you call her?

23 A Yes.

24 Q And how long was the conversation?

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1 A A couple of minutes. Maybe five
2 minutes.

3 Q And during the conversation, did she
4 ever tell you that she had firsthand knowledge
5 about specific things that were happening with
6 Shannon?

7 A No, she couldn't know.

8 Q So is it correct for me to say that
9 the things she said were things she had heard
10 from Jackson; is that right?

11 A She was at a meeting when this was
12 told.

13 Q When what was told? I just want to be
14 clear.

15 A That these two were IAD rats.

16 Q She was at a meeting?

17 A She was at a meeting with all the
18 parties involved.

19 Q So she was at a meeting with Jackson,
20 Roti, O'Grady?

21 A They were all present at this meeting.

22 Q And where did that meeting take place?

23 A Headquarters someplace. And I don't
24 know what -- could have been just a normal

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1 morning meeting and their names came up or
2 whatever. And that's when -- that was
3 discovered.

4 Q Can you tell me if you remember any
5 other names of folks who would have been part of
6 that meeting where it was said that Shannon and
7 Danny were rats?

8 A No.

9 Q I want to make sure I have everybody
10 who Bea told you was at that meeting. That would
11 have been Jackson -- Do you know Jackson's first
12 name?

13 A No.

14 Q Do you know anything about Jackson
15 except -- is it a he or she?

16 A He was the first deputy
17 superintendent. And then Roti was the chief of
18 organized crime. And O'Grady was the commander
19 of the narcotics unit.

20 Q Anybody else that was supposedly there
21 during that meeting?

22 A I don't know what -- I don't know
23 where or what was going on, what kind of meeting
24 it was. But, you know, I just know what those

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1 three guys allegedly said.

2 Q You've mentioned some of these names,
3 and I just want to make sure I make it clear
4 whether you know these folks or just heard their
5 name and that kind of thing. So I want to go
6 through the names of the defendants in this
7 lawsuit. Okay?

8 A Okay.

9 Q Juan Rivera, do you know Juan Rivera?
10 A Yeah. He was -- when I was in
11 confidential, he came to confidential as a
12 lieutenant because my lieutenant was retiring.
13 And he was briefed on all these cases including
14 the Watts case. And I think Rivera came there in
15 like 2004 or 2005. And he was briefed on Watts
16 and the investigations regarding his misconduct.
17 I mean, he was involved in everything. And we
18 even thought he was involved in the murder of a
19 policeman. And then I guess he stayed in IAD.
20 And then he became a chief there. I don't know
21 what a chief does -- we had deputy
22 superintendents; he's got a chief and four or
23 five commanders there. I don't know what the
24 hierarchy is in that division anymore.

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1 Q Have you had any conversations with
2 Juan Rivera about Shannon Spalding or Danny
3 Echeverria?

4 A No.

5 Q How about Debra Kirby, do you know who
6 that is?

7 A Oh, yeah, I know who she is. No, I've
8 never talked to her.

9 Q You never talked to her? Have you
10 ever worked with her?

11 A Yeah. She was the chief of staff --
12 what do they call -- she was the head legal
13 office for the police department. So being in
14 the IAD, I had dealings with her, but not
15 regarding this.

16 Q So you've had dealings with Debra
17 Kirby, but not regarding Shannon Spalding or
18 Danny Echeverria?

19 A Right.

20 Q James O'Grady, we just talked about
21 him. Besides the things you've already told me
22 about James O'Grady, is there anything else about
23 James O'Grady, any conversations -- I'm sorry,
24 you shook your head.

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1 A No.

2 Q Any conversations you've had with him
3 about Shannon Spalding or Danny Echeverria?

4 A Never.

5 Q What about Nicholas Roti?

6 A Wouldn't know him if he walked in this
7 room.

8 Q So you never met Nicholas Roti?

9 A No.

10 Q So you never had any conversations
11 with him about Danny Echeverria or Shannon
12 Spalding?

13 A No idea who that is.

14 Q So you've never had any conversations
15 with him about Danny or Shannon; is that right?

16 A Yes, Marlene. I don't know even know
17 who he is.

18 Q Robert Cesario. You just mentioned
19 his name. Do you know Robert Cesario?

20 A No.

21 Q Have you had any conversations with
22 Robert Cesario?

23 A No.

24 Q So you never talked to him about

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1 Shannon or Danny?

2 A No.

3 Q Nothing about this case?

4 A No.

5 Q Joseph Saleme, do you know who that
6 is?

7 A No.

8 Q You never any conversations with him?

9 A No.

10 Q Not about Shannon or Danny or anything
11 else?

12 A No.

13 Q Lastly, Thomas Mills?

14 A No idea who is.

15 Q So no conversations with Thomas Mills
16 about Shannon or Danny?

17 A No. Are these guys policemen or
18 crooks.

19 Q They're policemen.

20 A I had to ask.

21 Q Going back to -- So we've gone
22 through two conversations. You told me what
23 Shannon told you in the second conversation.

24 What, if anything, did Danny tell you during that

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1 second conversation?

2 A Basically that they were getting --
3 I'm cleaning this up -- they were getting screwed
4 over. They were sent to fugitive squad. They
5 weren't allowed to get cars. They weren't
6 allowed to be deputized. They were given the
7 impossible warrants to serve or the impossible
8 people to find. They were set up to fail. And
9 if you're a good policeman for 18 years, you all
10 of a sudden don't become a rotten policeman.
11 It's very unlikely that you'll turn the other
12 way. And it appears this is what the department
13 was doing, was making them bad policemen. It was
14 making them out to be bad policemen, when, in
15 fact, they did what they were supposed to do.

16 Q During that second meeting, was Danny
17 able to give you specific names of people who
18 were retaliating against him or --

19 A I mean, he said the sergeants, but I
20 don't remember sergeants' names. The only guy
21 that I remember being talked about was this
22 guy -- I think his name is Barnes -- who was from
23 confidential investigations in IAD and what he
24 had done. That was a name that kept coming up.

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1 They would ask me about procedures and what he
2 did and false arrests and allegations and not
3 being served and trying to question them --
4 that's the only name. You know, they very well
5 might have said names, but I remember that
6 Barnes.

7 MR. SMITH: I'm just going to make an
8 objection on the record for the compound nature
9 of the question and the assertion of was he able
10 to, just for the record.

11 MS. DAVIS: Okay.

12 BY MS. DAVIS:

13 Q As it relates to Barnes, was it
14 Shannon who was telling you about Officer Barnes?

15 A Oh, it was all three of them.

16 Q And specifically can you recall what,
17 if anything, or what they said specifically that
18 Barnes did as related to Shannon or Danny?

19 A Barnes at one time came to where they
20 were working, took Shannon out of wherever she
21 was, took her to a room, told her that she was
22 under arrest because she allegedly had a tape
23 recordings or something. Never gave her charges
24 and allegations. Did not give her the

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1 opportunity to call her attorney, to call her
2 supervisor. He just held her there for like
3 40 minutes trying to intimidate her. And then
4 finally, from what she said, he says, "Okay.
5 Never mind. I'm going to make this all go away.
6 You can leave now."

7 And he -- According to IAD policies
8 and procedures, if you're going to question an
9 officer, you have to give them notice. You have
10 to allow them time to get an attorney to
11 represent them or their union representative to
12 represent them. And to tell her that she's under
13 arrest and she had to answer these questions and
14 she had to surrender her phone or her computer
15 were all in violation of the rules and
16 regulations. And then to just say, "Okay. You
17 can leave now" was just abhorrent.

18 Q And this is what Shannon told you that
19 Officer Barnes and said to her?

20 A He was at sergeant. He might have
21 been the acting commander of confidential.

22 Q We're not doing a good job of letting
23 each other finish.

24 A I'm sorry.

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1 Q And the court reporter is going to get
2 mad at us. The thing you just said about
3 Sergeant Barnes, those are things that Shannon
4 told you; isn't that right?

5 A Yes.

6 Q Did you have an opportunity to speak
7 with Sergeant Barnes at all about this?

8 A No.

9 Q Did she tell you that anybody else was
10 present during the time Sergeant Barnes talked to
11 her?

12 A I don't know if there was an
13 officer -- might have been two women that were
14 working as secretaries in the unit. One of them
15 named Hannah, and I don't know the other woman.

16 Q And did she say that Sergeant Barnes
17 placed her under arrest?

18 A Yes.

19 Q Did she tell you exactly what she was
20 charged with?

21 A That --

22 MR. SMITH: Objection, form of the question.

23 MS. DAVIS: I'll restate that question.

24

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1 BY MS. DAVIS:

2 Q You said she said she was placed under
3 arrest. What was your understanding of what she
4 was placed under arrest for?

5 A He alleged that she had taped
6 conversations with a supervisor that threatened
7 her or something and that she had a conversation
8 on a tape recording of that conversation.

9 Q Did she ever tell you that she, in
10 fact, did have a tape recording of that
11 conversation?

12 A No.

13 Q Did she ever tell you that she was --
14 Let me strike that. As it relates to the
15 conversation with Sergeant Barnes, did she tell
16 you where the room was that she was supposedly in
17 with him?

18 A It was in somewhere in Homan Square.

19 Q Did she ever tell you that she was
20 free to go during the conversation?

21 A No. She told me that they would not
22 allow her to leave. They held her in that room
23 under the threat of the arrest and the charging.

24 Q Did she ever tell you whether or not

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1 she talked to her police -- her attorney during
2 the course of that conversation with Sergeant
3 Barnes?

4 A She was not allowed to.

5 Q So we're still on the second
6 conversation. That conversation happened.
7 Anything else you all talked about during that
8 second conversation that you had?

9 A No. I just gave you a cornucopia of
10 three or four conversations probably. I don't
11 remember each time what we talked about
12 specifically.

13 Q Okay. That's fair. So in total,
14 about how many conversations did you have, if you
15 can recall?

16 A Many.

17 Q Would you say more than five?

18 A Oh, yeah.

19 Q Did you have more than five meetings?

20 A Yeah.

21 Q About how many -- because I said
22 conversations. So let me break that down a
23 little bit more. In terms of face-to-face
24 meetings, how many meetings would you say that

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1 you had?

2 A In four years?

3 Q In four years.

4 A I would say -- and with the lawyer
5 counting being there too? A dozen.

6 Q And first I'm asking about not
7 meetings with the lawyer. So a dozen meetings as
8 it relates to just you, Danny, Shannon, and maybe
9 Tony, was that a dozen meetings?

10 A No. Because he was involved -- their
11 attorney, Dan Herbert, he was there. Their
12 attorney was there when they went the news media,
13 was asking questions about this. You know, I was
14 present at that.

15 Q How many meetings were you at where
16 there were lawyers at the meeting?

17 A Oh, I don't know.

18 Q Would you say ten?

19 A No, no, not ten. Maybe four.

20 Q Four?

21 A Four or five.

22 Q And during those meetings, who was
23 present during the meetings that you had with the
24 lawyers?

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1 A The lawyer. Another lawyer. That
2 girl -- woman that works for him that's an
3 attorney. Shannon. Shannon and Danny.
4 Sometimes Tony.

5 Q And during those meetings, would you
6 be having group conversations?

7 A Well, some of them. He took my
8 deposition.

9 Q Okay.

10 MR. SMITH: Can I object to the compound
11 nature of the questions in terms of different
12 meetings and different people?

13 BY MS. DAVIS:

14 Q Okay. Well, I'm just trying to get to
15 the -- just the bottom line as it relates to the
16 meetings and who was there. And I'm not trying
17 to step on any privileged conversations.

18 But you -- any meetings you were at
19 with lawyers present, what were the nature of
20 those conversations? Because you weren't there
21 represented by any of those lawyers, right?

22 A No, they're not my lawyers.

23 Q So what were the nature of those
24 conversations that you had with those lawyers?

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1 MR. SMITH: Again, I'm just going to object
2 to the compound nature of the question. You're
3 asking about all his meetings at once?

4 BY MS. DAVIS:

5 Q Well, we can go through it one by one.
6 You said you had maybe about four
7 meetings?

8 A Yeah.

9 Q So let's start with the ones that you
10 remember and kind of go in order. First meeting
11 that you had where the lawyers were present?

12 A Like with Herbert or with him, the
13 lawyers that are familiar with police department
14 procedures and general orders and rules and
15 regulations, they would say can you come down and
16 explain, you know, like the city has different
17 rules and regulations. An example I'll give you,
18 an EEOC complaint, there's federal laws that have
19 to be abided by, and you have to file the
20 complaint in a certain time.

21 Well, the city says now you can do it,
22 you have 18 months to file the complaint, where
23 federal law says you have to do it different.
24 The city, they have different rules and

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1 regulations. So he wouldn't necessarily know
2 what rules and regulations were violated by
3 Rivera or Murphy or the lieutenants or the
4 sergeants because he doesn't work with those
5 rules. I worked with them for 18 years, helped
6 revise them and teach classes on them, so I might
7 know more than he does regarding that; whereas
8 he, or any lawyer, knows more about the law than
9 I do.

10 Q And so the nature of at least one of
11 those meetings was about that, you explaining the
12 rules and policies and procedures; is that right?

13 A One. And then another one would be
14 they were going to depose somebody. And they
15 would ask me, well, what are the responsibilities
16 of the lieutenant? What are the responsibilities
17 of the commander? What -- we call it, police
18 terms, it's the conduct of investigation, how
19 you're supposed to handle an investigation.

20 You know, you get the CR number. Then
21 you interview the witnesses. Then you interview
22 the complainant. And then you go after the
23 witnesses and accused, and that's how you come to
24 this conclusion. Well, the order that these

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1 things have to be done is pretty well-defined in
2 the rules and regulations.

3 Q And during those meetings where you
4 were discussing the rules and regulations,
5 besides the lawyers present, who else was present
6 for those meetings?

7 A In some cases an associate or a lawyer
8 that worked with him. I think Shannon. Shannon
9 was probably there. And on some occasions Tony
10 and some occasions Danny.

11 Q Besides talking with them about the
12 rules and regulations and the policies and
13 procedures, was there anything else that you
14 discussed during those meetings that you had with
15 the lawyers other than about the policies and
16 procedures?

17 A Other than I made him buy lunch every
18 time I went down there, no.

19 Q And besides the people that you
20 already named, some of the lawyers and some of
21 their staff and occasionally or sometimes Danny
22 and Shannon or Tony, anybody else present for any
23 of those conversations?

24 A Geez. I mean, Phil Rogers from NBC

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1 news was there because they were going to put it
2 on the news. But, I mean, you know, he was in an
3 office one day when they were doing -- I mean, he
4 was there when they were going to put this
5 corruption thing out on the news and his
6 cameraman. I can't remember each and every
7 person that was at every meeting because
8 sometimes Danny is, sometimes Tony is.

9 Q Did you have conversation with Phil
10 Rogers about the case?

11 A Oh, yeah. He asked me, and I wouldn't
12 go on camera.

13 Q More than one conversation with Phil
14 Rogers?

15 A No.

16 Q Let me show you what I'm going to mark
17 as Koconis Exhibit 1.

18 (A short recess was had.)

19 BY MS. DAVIS:

20 Q We're back on the record. I'm just
21 going to remind you --

22 A I'm under oath.

23 Q -- that you're under oath.

24 Mr. Koconis, Mr. Peter Koconis?

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1 A Just say Peter. Koconis is a toughy,
2 isn't it?

3 Q It's just the way it's spelled. Makes
4 me want to say something else.

5 So I've already marked Koconis
6 Exhibit 1. Let me ask you have you had a chance
7 to review this --

8 A Yes.

9 Q -- affidavit? Okay.

10 A Yes, I did.

11 Q We just took a break. Did you -- were
12 you reviewing the affidavit during the break?

13 A Sort of just read it now.

14 Q But other than just reading it here in
15 this room, did you read it or go over it while we
16 were on break?

17 A Just here.

18 Q Look to the last page, page 5. Is
19 that your signature?

20 A Yes.

21 Q And did you draft this affidavit?

22 A What do you mean?

23 Q Did you write this affidavit?

24 A No.

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1 Q Do you know who did?

2 A I think Chris.

3 Q Did you have a chance to review it
4 before signing it?

5 A Yes.

6 Q And when you were reviewing it, did
7 you make any corrections to it before you signed
8 it?

9 A When it was first done, no.

10 Q I'm going to put on the record that in
11 between the break when I saw Peter reviewing the
12 transcript, he made mention that there was a
13 change or something that needed to be made to it,
14 an error that was on it. I'm going to ask you to
15 draw my attention to what that error is now.

16 A It's not really an error. In
17 paragraph 12, it says sometime on or about the
18 year 2011, Officer Spalding contacted me
19 requesting a meeting and that it was urgent. The
20 first call came from Lieutenant Karyn Murphy, and
21 then Officer Spalding called.

22 Q As you sit here, are there any other
23 corrections or changes or things that should be
24 added or taken away from this document to make it

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1 accurate?

2 A I don't think so.

3 Q And as you sit here now after having
4 reviewed it, do you stand by all the statements
5 that are made in there, with that one correction?

6 A Yeah, everything is the same.

7 Q Who approached you about actually
8 doing an affidavit in this case?

9 A I think Spalding said that her
10 attorney, Chris, would like me to do an
11 affidavit.

12 Q And when did she tell you that?

13 A Sometime before we did the affidavit.

14 Q Was that in a telephone conversation?

15 A Yes.

16 Q It wasn't face-to-face?

17 A No.

18 Q Was anybody else on the telephone when
19 she asked you to provide an affidavit?

20 A I don't think so.

21 Q And prior to your signing the
22 affidavit, did you have any conversations with
23 anybody about what to put in the affidavit?

24 A No. He asked questions; I answered.

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1 Q And so let me go over that. So you at
2 some point talked to Chris about this affidavit?

3 A Yes. And I believe the girl, the
4 woman was with you, the -- your assistant or
5 whatever, I think that two of them were in the
6 office.

7 Q And did you talk to them about the
8 affidavit in this office?

9 A Yeah.

10 Q Was that the first time you met Chris?

11 A I don't remember.

12 Q And so the things included in the
13 affidavit, the paragraphs 1 through 18, are these
14 all things that you told to Chris?

15 A Yes.

16 Q And then once you told this
17 information to Chris, then he or somebody in his
18 office then authored this affidavit; is that
19 right?

20 A They typed it, and I signed it, and it
21 got notarized by Kenneth Sison.

22 Q Do you remember if there were any
23 other drafts or revisions to the document before
24 you signed it?

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1 A I don't recall any.

2 Q Was it January 20, 2015, when you
3 signed it?

4 A Yes. That's the date on there.

5 Q Did you sign it in Chris's office?

6 A Yes.

7 Q Was there anybody else present when
8 you signed the affidavit?

9 A Kenny Sison.

10 Q Was there anybody else beside Kenny
11 Sison?

12 A Maybe that girl.

13 Q Do you remember when Danny or Shannon
14 were present when you signed the affidavit?

15 A I don't remember.

16 Q Do you know an officer by the name of
17 Michael Spagaren?

18 A No.

19 Q Do you know if he was present when you
20 signed the affidavit?

21 A I don't even know who he is.

22 Q What about anybody else, do you
23 remember anybody else being present before --
24 while you were there to sign the affidavit?

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1 A I mean, Spalding could have been
2 there, but that would be it that I could
3 remember.

4 Q How long were you at Chris's office on
5 the day you came to sign this affidavit?

6 A Probably a couple hours.

7 Q And besides signing this affidavit,
8 what else, if anything, did you do while you were
9 at the office?

10 A I remember telling a woman that was
11 his assistant that she shouldn't leave the
12 pictures on the floor, that she should hang them
13 in her office.

14 Q Okay.

15 A And we could have talked about some
16 policy or procedures with the department and
17 rules and regulations, but I couldn't remember
18 any specifics.

19 Q Do you recall whether or not Shannon
20 provided any information that -- Let me strike
21 that.

22 On the day that you came to Chris's
23 office to sign this affidavit, was there anybody
24 else giving input as to what should be in this

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1 affidavit besides yourself?

2 A I don't recall anybody.

3 Q And that includes Shannon? Did
4 Shannon give you any input as to what should be
5 in this affidavit?

6 A When you say input, what do you mean?

7 Q I mean, you said that you were talking
8 to Chris about what should be contained in the
9 affidavit. Was there kind of group input? Did
10 somebody else include information that should be
11 put into this affidavit?

12 A Well, Spalding would have told me
13 about all the stuff that led up to this, and so a
14 lot of this information I got from her. But the
15 stuff regarding Watts and Rivera, that I knew
16 from working in IAD. My thing with Officer
17 Dignan that I referred to earlier and Karen
18 Rowan, that's on me. But, like, you know, where
19 Shannon and Echeverria were working, you know,
20 joint investigation with the FBI, she would have
21 told me that.

22 Q Let me be a little bit more specific
23 with my question. I understand that you
24 testified before all the information with

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1 regarding to Shannon and Danny are things that
2 they told you.

3 A Right.

4 Q I mean on the day that this affidavit
5 was being put together, was it the case that you
6 were giving -- specifically telling the
7 information to Chris or anybody else to put it in
8 the affidavit, and they too, Shannon or Danny,
9 were giving information at that time then for
10 this affidavit?

11 A No, I don't think that they would have
12 given any information. I mean, I don't recall.
13 I know -- I can't say I know, but she was
14 probably there.

15 MR. SMITH: Just for the record I'm going to
16 object to the beginning of that question in terms
17 of form, other than what he's already testified
18 to about other sources besides Shannon and Danny.

19 BY MS. DAVIS:

20 Q Okay. So you're saying you don't
21 recall specifically whether she was there or not.
22 Is that your testimony?

23 A Specifically, no. She could have
24 been, but I don't remember back that far.

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1 Q Was there anything that was typed in
2 this affidavit originally that you refused to
3 attest to?

4 A I don't think so.

5 Q Did Shannon promise you anything in
6 exchange for signing this affidavit?

7 A No.

8 Q Do you know what I mean by that?

9 A Yeah. Did she offer me money or --
10 no.

11 Q Exactly, money or any other --

12 A As a matter of fact, I'll tell you I
13 make this joke: It costs me money to meet them
14 because they come to my house or whatever and I
15 pay for the pizza.

16 Q I think you mentioned before that
17 Danny or Shannon have been to your house. How
18 many times have they been to your house?

19 A Danny and Shannon and Tony, altogether
20 they've been to my house three or four times.

21 Q And that's during the -- and the time
22 period for that is between the time 2011 when you
23 first met them up until when was the last time
24 they were there?

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1 A Oh, God, sometime last year, I think.
2 I had to have surgery, a hip replacement, so I
3 couldn't go downtown, so I made them come by me
4 if they wanted to talk.

5 Q So the times that they came to your
6 house, they came to talk to you about this case?

7 A Yes.

8 Q And when they came to talk to you,
9 what specifically did they talk to you as related
10 to this case?

11 A They would ask me questions as to
12 people that that they wanted to depose or that
13 the lawyers wanted to depose, and they would ask
14 me what were the rules and regulations and
15 general orders regarding the responsibilities and
16 duties of a police officer, commander, or
17 lieutenant or supervisor or whatever, on what
18 they were supposed to do in given situation --
19 not just this one, but general situations the
20 rules say you have to do this and this and this.
21 And it applies to everyone for everything, not
22 just their case.

23 Q Did they ever discuss with you or ask
24 you specific questions about strategy or what

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1 they should be doing in this case?

2 A No.

3 Q So the times they've come to your
4 house to talk to you, is it your testimony that
5 you all never talked specifically about the
6 actions that should be taken in this case and the
7 people that should be deposed in this case?

8 A No. Because I don't know most of
9 those people.

10 Q So I want to walk through kind of --
11 and we've talked about some of these things, so I
12 won't belabor the things we've already talked
13 about.

14 I want to start at paragraph 4,
15 paragraph 4 through paragraph 8. Will you look
16 at those?

17 A Okay.

18 Q Those paragraphs are about general
19 operational procedures as it relates to reporting
20 misconduct; isn't that right?

21 A Yes.

22 Q As it relates to those paragraphs,
23 specifically paragraph 4, it says: While
24 assigned there -- and that would be IAD -- I

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1 assisted in writing general orders and
2 operational procedures on the disciplinary
3 policies to be followed by sworn personnel
4 including members of IAD, Office of Professional
5 Standards, OPS, now known as the Independent
6 Review Police Authority, the IPRA. That's your
7 testimony from this affidavit; is that right?

8 A Yes.

9 Q Now, when you say you assisted in
10 writing those general orders, can you help me
11 understand what exactly you did? Did you have
12 input? Did you actually write them? Was it a
13 committee? Was it a team?

14 A It was a team. And we go through the
15 old procedures and there were some orders that
16 were outdated and there were some policies that
17 were outdated. And the assistant department
18 superintendent at the time wanted it to be more
19 up-to-date and wanted the investigations to be
20 coordinated so that they were all handled in the
21 same way by us and OPS.

22 Q Who were the other officers on that
23 team that assisted in writing these general
24 orders and operational procedures?

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1 A Bob Bresnahan who was a lieutenant in
2 special investigations.

3 Q How do you spell that?

4 A B-r-e-s-n-a-h-a-n, Robert. Thomas
5 Tracketello, T-r-a-n-c-k-e-t-e-l-l-o. Phyllis
6 Muzzupappa, M-i-z-z-u-p-p-a. And there were
7 other people involved. And I can't remember all
8 of them because different sections would have
9 different input. And what we did with this then
10 we developed a course of training under Terry
11 Hillard and Karen Rowan, who was the department
12 legal officer at the time, where we made or
13 required everyone that was an investigator in IAD
14 no matter how long had been there and
15 investigators in OPS go through courses at the
16 police academy and received certificates of
17 training regarding interrogation, conduct of the
18 investigation, proper interviewing, controlling
19 of evidence, arrest procedures, and various other
20 things.

21 Q Now, is it your testimony that you had
22 a hand in writing the policies and procedures for
23 all of those things?

24 A Yeah. I had input because I had been

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1 there the longest.

2 Q So make sure I understand. And this
3 is where you can educate me a little bit. Was it
4 like a big training manual and you had input on
5 the whole manual? Was it specific sections and
6 you had input on specific sections?

7 A I wouldn't know anything about the
8 records section. That was Phyllis Muzzupappa. I
9 know they kept records, but I don't know how long
10 when you had to throw them out, I don't know what
11 they were classified or filed under. But mostly
12 I did interrogations, conduct of the
13 investigation, and interviews.

14 Q So those were the sections in
15 particular you know you -- Wait, you have to let
16 me finish. Those were the sections that you know
17 specifically you had a hand in writing and
18 drafting?

19 A Yes.

20 Q Any other sections that you can think
21 of that you haven't mentioned?

22 A No. We even had a seasoned police
23 detective, homicide detective -- I just had his
24 name -- Steve something or other. He just passed

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1 away. He helped in the interviewing process. We
2 went outside the IAD to get an experienced
3 detective who handled homicides to assist us in
4 this.

5 Q And do you know if the sections that
6 you were part of writing have ever been amended?

7 A Oh, yes.

8 Q So when would you have finished your
9 process in terms of the policies and procedures
10 you had a hand in drafting?

11 A It's when Hillard was a
12 superintendent, so 2006, '7, something like that.

13 Q And since 2006 or 2007, do you know
14 how many times those rules have been amended?

15 A No, I don't know.

16 Q But you do know that they have been
17 amended; is that right?

18 A No, I don't, because there's only so
19 many ways you can interview, interrogate
20 somebody. You know, you just --

21 Q Do you know if there were any other
22 policies and procedures governing some of the
23 types of conduct that these policies and
24 procedures were designed to address?

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1 A I'm sorry. I don't understand that.

2 Q That's fair. I'll change the
3 question. Besides those particular policies and
4 procedures, were there other procedures or rules
5 or other, I guess, information that could be
6 consulted that was -- that was different than the
7 policies and procedures you all were working on?

8 A I think what caused this revamping was
9 some different sections -- there was different
10 sections of the IAD. There was general
11 investigations, special investigations,
12 confidential investigations. And then OPS
13 handled brutality, shootings, domestic violence
14 cases. And I think what they wanted was
15 everybody to interpret the rules and the orders
16 the same way so there wouldn't be any kind of a
17 conflict between the way I did an investigation
18 and somebody else did, or the way OPS did and
19 somebody in general did. So they wanted
20 everybody to be on the same page. So all the
21 reports would be done the same way, the findings
22 and the way everything was concluded, you know,
23 just the format, everything was done the right
24 way.

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1 Q And so it's your understanding that
2 the policies and procedures that you all were
3 working on were geared towards making everybody
4 adhere to the same policies and procedures; is
5 that right?

6 A Yes.

7 Q And do you know whether or not that,
8 in fact, happened? What I mean by that is do you
9 know whether or not there were still other rules
10 and policies and procedures that other sections
11 were following that were different than the
12 policies and procedures you were following or you
13 were writing, helping draft?

14 A I believe that after all this was done
15 and everybody had gone through this course that
16 everybody adhered to the same rules.

17 Q I'm turning your attention to
18 paragraph 9. If you'll look at that real quick.

19 A Okay.

20 Q And my only question about paragraph 9
21 is as it relates to this case, Shannon Spalding
22 and Danny Echeverria, did you ever have any
23 conversations with Ronald Watts or anybody
24 related to that investigation as it related to

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1 Danny or Shannon?

2 A No.

3 Q Turning your attention to
4 paragraph 11. Paragraph 11 -- and you've already
5 reviewed that; is that right?

6 A Uh-huh.

7 Q You requested reassignment to another
8 division from IAD after your recommendation to
9 fire Officer Dignan was not followed; is that
10 right?

11 A When she tried -- when Rowan tried to
12 get me to change my finding, that's when I said I
13 want out.

14 Q So you requested another assignment to
15 a new division?

16 A Yes.

17 Q And that assignment was granted?

18 A Not by her. I had to go to the first
19 department superintendent to get out. She tried
20 to stop me from leaving.

21 Q But you ultimately were reassigned?

22 A Yes.

23 Q When you would give recommendations as
24 to what should happen to officers or personnel,

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1 was it you who had the ultimate decision as to
2 whether somebody would be terminated?

3 A No.

4 Q So there were other people who weighed
5 in on those kind of decisions?

6 A No. Could I explain?

7 Q Yes.

8 A I was allowed to suspend at that time
9 the policy was that I was allowed to recommend
10 termination or suspension of 30 days. If I
11 recommended termination, it would be reviewed by
12 the legal officers in the police department. It
13 would go to the police board, and then eventually
14 the superintendent would sign off on it. But as
15 to my recommendations or anyone's
16 recommendations, people that worked for me, I
17 would look at their findings or their reports and
18 I would say you have to -- you know, get this or
19 you have to get a certified copy of conviction or
20 you have to have this or this to make sure your
21 case is strong.

22 I'm sure some people had to do that
23 with my cases because I may be blind to something
24 that I'm doing, whereas somebody else would catch

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1 something that I might have missed.

2 Q Understood. So as it related to your
3 authority, so to speak, you could give
4 suspensions up to 30 days, but terminations went
5 to other people, to someone else?

6 A All your recommendations always went
7 up the chain and always went to -- my lieutenant
8 would approve them. Then it would go to the --
9 in our case, an assistant department
10 superintendent. And then if it went to firing,
11 it would go to the advocate section for review to
12 make sure that it followed legal standards. And
13 then it would go to the police board.

14 Q I want to move on to paragraph 12
15 where it says: Sometime on or about the year
16 2011, Officer Shannon Spalding contacted you
17 requesting a meeting and that it was urgent.

18 You had already said it was Karyn?

19 A It was Murphy.

20 Q It was Karyn Murphy who first
21 contacted you; is that right?

22 A Yes.

23 Q But as it relates to this
24 paragraph 12, when Officer Shannon Spalding

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1 contacted you, did she tell you that it was
2 urgent and she wanted a meeting?

3 A Yes.

4 Q And we discussed those meetings that
5 you had with Shannon that are the subject of
6 number 12 in this paragraph; is that right?

7 A Yes.

8 Q When Shannon first contacted you and
9 said she wanted a meeting and it was urgent, have
10 you told me everything that you guys talked about
11 as related to that first contact to you?

12 A As best to my recollection, if you
13 ever spoke with Shannon Spalding, she talks and
14 she's quick and she's fast and she's got all
15 these facts. And at some point I would have said
16 wait a minute, we have to talk in person because
17 I can't follow all this.

18 Q And that's then when that first
19 meeting was arranged at the restaurant; is that
20 right?

21 A Yes.

22 Q I want to move to paragraph 13. Where
23 it says during the meeting, Shannon informed me
24 that she and Officer Danny Echeverria had been

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1 working on a confidential joint investigation
2 with the FBI. It goes on to say: During this
3 time, the confidentiality of their identities had
4 been breached, and the targets of their
5 investigation, which included sworn members of
6 the police department, were not only aware of
7 their identities and the nature of the
8 investigation, but also began retaliating against
9 both Shannon and Danny.

10 As it relates to paragraph 13, as you
11 sit here now, besides any of the other things
12 that we've talked about, can you name any
13 specific people that Shannon and Danny were
14 referring to as it relates to paragraph 13 of
15 this affidavit?

16 A Do you mean the accused or do you mean
17 who began retaliating against them?

18 Q I mean who began retaliating against
19 them, where it says, "but also began to retaliate
20 against Shannon and Danny."

21 A That would be Roti and O'Grady and
22 then other supervisors in narcotics.

23 Q Any other names of other supervisors
24 in narcotics that you can think of?

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1 A Just Cesario is one of them. We
2 talked about him. I don't know if he was a
3 sergeant or a lieutenant there. But he was one
4 of their supervisors.

5 Q Before we move on, any other names of
6 specific people you can think of that they
7 related to you?

8 A They might have mentioned names, but
9 names mean nothing to me.

10 Q What about when you say names mean
11 nothing to you, what about districts or other
12 things that would make you know who the people
13 were if you can't remember names?

14 A See, at the time they were -- this was
15 a federal investigation and they were worried,
16 you know, what they could say and -- because I
17 worked on some and -- I think it's Title 19 or
18 whatever where you can't reveal stuff. So there
19 were things that they couldn't tell me
20 specifically, but in general they could tell me.
21 And later on it became known that it was Watts.
22 And then that's when I said, well, he was under
23 our radar when I was in the CHA transition team
24 and then when I was in the IAD.

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1 Q I want you to look at paragraph 14.
2 "Both officers expressed great concern for their
3 safety and provided me with detail regarding the
4 hostile work environment, extreme retaliation,
5 lack of backup and other support from members of
6 the department, including the identities of
7 individuals involved in the retaliatory conduct."

8 I want to stop right there for a
9 second.

10 A Okay.

11 Q As it relates to hostile work
12 environment, can you recall specific
13 conversations or -- let me go back -- specific
14 instances of hostile work environment that Danny
15 and Shannon shared with you that's the subject of
16 paragraph 14?

17 A They were told by -- I'm relating what
18 she said. They were told by other officers that
19 they were instructed not to back these two up.
20 Also Shannon had told me that one of the
21 supervisors told her, you know, "Why don't you
22 leave or quit? Because I don't want to have to
23 call your daughter and tell her that her mother
24 is not coming home."

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1 Another aspect of the safety, this
2 Ronald Watts, as I said before, was suspected of
3 assisting a gang and having a police officer
4 killed, and they were worried that somebody could
5 hurt them, shoot them, or hurt their families or
6 do other things in reference to this.

7 Q And so that's an example of hostile
8 work environment and extreme retaliation?

9 A Sure. If I can expound a little?

10 Q Sure.

11 A There was a case years ago where a
12 policewoman, her name was Cynthia White, reported
13 corruption in the Second District, and the police
14 department and the FBI were involved in this.
15 And she then came to work in the internal affairs
16 division. And between the city and the FBI, they
17 were worried she would be hurt by these officers
18 that she sent to jail, and they moved her out of
19 the city, which is directly against the rules and
20 regulations and the law. You have to reside in
21 the city to be a policeman. They were so
22 concerned for her safety, they moved her out of
23 the city.

24 And so when this came up, this girl's

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1 name popped right in my head because I worked
2 with her. I know her quite well. And this was a
3 situation where she -- you know, they could -- if
4 these people wanted to hurt them, they could hurt
5 them.

6 Q During your conversation with Shannon
7 and Danny, did they bring up to you anything
8 about the Cynthia White situation?

9 A No. They didn't know about it.

10 Q That's something you knew about?

11 A Right.

12 Q As it relates to things they were
13 talking to you about, any other specific examples
14 that they gave you as it relates to the subject
15 of paragraph 14, the hostile work environment,
16 that relates to their case or the alleged lack of
17 backup?

18 A No. Just what they were told and what
19 other officers had told them and what a specific
20 supervisor told them, you know, told Shannon that
21 "I don't want to tell your daughter that you're
22 not coming home."

23 Q Do you remember the name of that
24 supervisor?

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1 A I have no idea what his name is.

2 Q And as it relates to backup, is it
3 your testimony that they told you there were
4 officers who would not back them up?

5 A Yes.

6 Q And did they give you names of
7 specific officers that would not back them up?

8 A Again, as a supervisor, we had a
9 policeman that was a strange guy in the district
10 that I supervised, and somebody said at a
11 rollcall when this guy wasn't present that if he
12 ever called for help, we weren't going to back
13 him up. And I said at that rollcall that I was
14 conducting, "If that ever happens and I see
15 nobody going or I see you going the other way, I
16 will suspend you. I don't care how bad the guy
17 is, he deserves to be -- he's doing a job, he's
18 wearing a badge, you better back him up."

19 Q I understand. I agree. Officers need
20 to be backed up. I'm asking you did Danny or
21 Shannon tell you of specific people who said they
22 failed to back them up or said they would not
23 back them up?

24 A No. They told me the name of the

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1 sergeant that told them. I don't recall what it
2 is. I can't remember which sergeant.

3 Q And did they ever tell you they were
4 in any situation, specific circumstances where
5 they had called for backup, and no one backed
6 them up?

7 A No.

8 Q So am I correct that this was
9 something that they, I guess, had a fear of, but
10 it's not something that actually happened; they
11 never called for backup and were not backed up?

12 MR. SMITH: Objection, foundation.

13 BY MS. DAVIS:

14 Q Is that right? You can answer.

15 A My answer to that would be if somebody
16 of a supervisory capacity told me that, then I
17 would be worried for my safety. Because that
18 supervisor in a specialized unit controls what
19 his officers do and controls their job
20 assignments, their money, their cars. And so
21 they would be reluctant to disobey him and out of
22 sheer stupidity might not go to back them up.

23 Q But Danny and Shannon never told you
24 about instances where they called for backup and

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1 no one came?

2 A No.

3 Q At the end of 14 where it says:

4 "Danny and Shannon turned to me for advice,
5 informing that they had on multiple occasions
6 spoken directly with chief of IAD, Juan Rivera,
7 and had requested CR investigations be initiated
8 on their behalf with negative results." That too
9 is information that Danny and Shannon told you;
10 isn't that right?

11 A That and Lieutenant Murphy.

12 Q So Danny and Shannon and you're saying
13 Lieutenant Murphy also told you this information?

14 A Murphy said they wouldn't get -- that
15 they couldn't get a CR number where they were
16 assigned, so they came to her.

17 Q Understood. So it's your testimony
18 here that also Karyn Murphy told you that Shannon
19 and Danny could not get a CR investigation where
20 they were assigned. Is that right?

21 A Could I explain a little bit?

22 Q First I want you to answer my question
23 to make sure I'm clear. So Shannon and Danny
24 told you they could not get a CR investigation

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1 initiated on their behalf, right?

2 A Right.

3 Q And then Karyn Murphy, did she also
4 tell you that in her own knowledge she knew that
5 they could not get a CR investigation?

6 A What she said is their lieutenant
7 would not get a CR number. They went to her.
8 Realistically she should have got a CR number.
9 But she gave them the direction, you know, A, go
10 to Rivera and then call him, meaning me. So one
11 or both of them went to Rivera. And Rivera
12 should have assigned a CR number right away. And
13 you have to understand something, what we call a
14 CR number now, they had a different number --
15 they have a different name for it recently in the
16 IAD. There's a number given, and then they find
17 out whether it's warrants a complaint
18 investigation or it doesn't. So they give it a
19 number.

20 Now, in these days, it was a CR
21 number. And then they -- one of them went to
22 Rivera. And Rivera said Shannon -- that's who --
23 Shannon went to Rivera. Rivera said that Tony
24 had to come in to get a CR number for something,

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1 and, in fact, was a violation of the rules
2 because his job was to get the CR number,
3 interview the complainant, take a report from the
4 complainant, and then go out and interview the
5 victim, which would have been Tony, I guess, in
6 one of these cases. And then a CR number would
7 be investigated along the channels.

8 Q I understand. But I guess maybe I'm
9 not being clear on the one specific fine point
10 I'm going to put on this. What I'm really trying
11 to understand is whether Karyn Murphy told you
12 that she knew for a fact from her own firsthand
13 knowledge that they couldn't get a CR initiated
14 or whether she told you that was her
15 understanding from them?

16 A That was her own knowledge that
17 that -- their supervisor would not get a CR
18 number.

19 Q Okay. Gotcha. That's my question.
20 Anybody else besides Karyn Murphy,
21 Shannon, and Danny ever talk to you about Shannon
22 and Danny not being able to get a CR
23 investigation initiated?

24 A No.

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1 Q Okay. I'm going to move to
2 paragraph 17 because I think we've really talked
3 about what's in paragraph 15 and 16.

4 Paragraph 17. "After Shannon and
5 Danny informed me they had been removed from
6 their detail of 543, I had a conversation with
7 Deputy Superintendant Beatrice Cuello inquiring
8 why either of these officers would be removed
9 from their assignment." Let me stop right there
10 for a second.

11 So Shannon and Danny told you that
12 they were removed from the detail of 543; is that
13 right?

14 A Yes.

15 Q Did they tell you why it was that they
16 were removed from that detail?

17 A Yes.

18 Q What did they tell you?

19 A That they had uncovered during the
20 course of the investigation in the federal
21 building they were looking at files, and they
22 recognized some of the people being investigated
23 to be Chicago police officers. They then went
24 and informed their supervisor that police

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1 officers were involved, which they are required
2 to do. At that point, they were taken off the
3 federal -- the FBI task force and sent back to
4 narcotics. But somehow during the course of all
5 this, somebody -- from what I understand, it was
6 Rivera -- had told the commander of narcotics and
7 the chief of organized crime that there was
8 officers involved in possible corruption and
9 outed Danny and Shannon as the ones that
10 discovered it, when, in fact, the FBI had
11 discovered it, and they only happened upon it
12 when they were working on a side-by-side case.

13 Q So it's your testimony or it's your
14 understanding that it was Rivera who allegedly
15 outed Danny and Shannon as it relates to their
16 involvement in the investigation?

17 A Yes. He outed them to Roti and
18 O'Grady, and O'Grady outed them to everybody
19 else.

20 Q The conversation you had with Deputy
21 Superintendent Beatrice Cuello, we've talked
22 about that?

23 A Right.

24 Q Is there anything else that you and

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1 she talked about that we haven't already talked
2 about?

3 A No.

4 Q Where exactly did that conversation
5 happen? Was it on the phone?

6 A On the phone to her office.

7 Q Was anybody else around when you had
8 that conversation?

9 A No. She wasn't there, and she called
10 me back, and I don't know where she called me
11 back from.

12 Q But nobody was in the room with you
13 when you were having that conversation?

14 A No.

15 Q You stated before, and it says here,
16 that during the conversation, Cuello stated to me
17 that both officers were good officers and Cuello
18 never had experienced any problem with them.
19 Besides what's here and any of the other things
20 that we talked about, did you have any other
21 conversations with Beatrice Cuello?

22 A No.

23 Q I just want to make sure this is clear
24 for the record. At the bottom of 17, it says:

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1 "However, during a meeting which included
2 Department Chief James Jackson, Commander James
3 O'Grady, and chief Nicholas Roti, James O'Grady
4 and Nicholas Roti stated they refused either
5 officer to return to their units of assignment
6 within 189 due to the fact that Danny and Shannon
7 were IAD rats."

8 What I want to make sure is clear,
9 that statement, that information was information
10 that Cuello told you that Shannon and Danny told
11 her; is that right?

12 A Shannon and Danny wouldn't have talked
13 to Beatrice.

14 Q Then I got that wrong?

15 A I don't think.

16 Q So let me turn your attention to
17 paragraph 17. I just want to make sure that that
18 last statement that starts with "However," that
19 whole statement, I just want to make sure that
20 that statement is a statement that was told to
21 you, I guess, by Danny and Shannon.

22 A No, no.

23 Q That's not something that you
24 specifically had firsthand knowledge of?

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1 A No. Cuello, after she looked into the
2 fact of what was going on with Danny and
3 Beatrice, said that they weren't going to be
4 allowed to go back to -- O'Grady didn't want them
5 back because they were IAD rats.

6 Q The point I want to clarify is the
7 part that says "during a meeting, which included"
8 these people's names --

9 A Yeah. That's who Cuello said who was
10 at this meeting.

11 Q At that meeting, and she was at that
12 meeting too?

13 A Beatrice was.

14 Q Beatrice Cuello was at that meeting?

15 A Yeah.

16 Q So your testimony is that Beatrice
17 Cuello was at the meeting where Deputy Chief
18 James Jackson, Commander James O'Grady, Chief
19 Nicholas Roti, and James O'Grady were there, and
20 this statement was made that Shannon and Danny
21 could not go back to narcotics because they were
22 IAD rats?

23 A Yes. But I don't know that meeting
24 was just for that or it was just a regular

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1 meeting. And she said, hey, what about these two
2 policemen? And that's when the conversation came
3 up, no, that they can't go back there.

4 Q I got it. There could have been other
5 things discussed?

6 A Right.

7 Q But Beatrice Cuello said specifically
8 that was said at that meeting?

9 A Yes.

10 Q And she was there?

11 A Yes.

12 Q And she heard it?

13 A Yes.

14 Q All right. Lastly -- we're almost
15 done. Paragraph 18. I'm going to read this so
16 we're on the same page, paragraph 18. "While
17 visiting an acquaintance of mine, Lieutenant Paul
18 Kusinsky, assigned to the tactical team in the
19 24th District, the conversation came up that
20 Lieutenant Cesario and Lieutenant Kusinsky
21 recently had a conversation during which
22 Lieutenant Cesario stated something to the effect
23 of, and I quote, 'I cannot believe they middled
24 me into fucking with them, and now I'm involved

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1 in this federal lawsuit, end quote.'

2 "He further stated, quote, 'Look at
3 this shit. All because I fucked with Shannon and
4 Danny because O'Grady and Salemme told me to,'"
5 end quote. That's a mouthful.

6 A Yes.

7 Q So let's break that down a bit.

8 So Paul Kusinsky, he's a friend of
9 yours?

10 A No.

11 Q I should say an acquaintance of yours?

12 A I know him. He was a tact lieutenant
13 in 24. And I was there visiting my old bosses
14 and BS'ing, and conversation came up, and this
15 thing came up. And I told him that I had met
16 these people. And I don't know how it came up.
17 And he basically said, "I know this guy, and he
18 said that he got middled by O'Grady."

19 Q And what exactly does it mean to be
20 middled?

21 A An example would be O'Grady would say
22 something to Cesario to do. You know, I want you
23 to take this car and drive it to Gary, Indiana.
24 And then he gets caught driving the city car in

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1 Gary, Indiana, and Cesario says, "Well, O'Grady
2 told me to do it." And O'Grady says, "No, I
3 didn't." That's being middled. That's being put
4 in the middled.

5 Q Understood. Thank you for that. That
6 makes it clear.

7 And so in the statement in
8 paragraph 18, it's your testimony that Kusinsky
9 told you that Cesario made that statement, the "I
10 can't believe they middled me" --

11 A Words to that effect, yes.

12 Q That statement?

13 A Yes.

14 Q So Kusinsky told you that Cesario told
15 him that statement?

16 A Yes.

17 Q And how is it that the conversation
18 came about that Cesario's name or this statement
19 ever even came up in the conversation?

20 A Because Hernandez used to work at 24.
21 The Sergeant Padar worked in 24. He worked in
22 24. We were talking about -- there was some
23 other incident, some other corruption incident
24 came up, and we were all sitting there talking.

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1 And I said, yeah. And I'm telling them about
2 these two kids that are getting screwed over
3 because of a federal -- an FBI stole some money
4 and screwed up their whole case. And in the
5 course of the conversation, that came out. And
6 people that I've talked to said that this Cesario
7 is a good guy and a great boss. And I don't know
8 him from Adam.

9 Q When you had that conversation with
10 Kusinsky, was anybody else around when you and he
11 were talking?

12 A There were people in the office, and I
13 can't remember who they were.

14 Q Do you know if anybody else heard the
15 statement that you're saying Kusinsky told you
16 that Cesario made?

17 A There was a group of us talking about
18 a whole bunch of things and, I mean, I couldn't
19 remember what team it was, you know.

20 Q But it wasn't just you and Kusinsky
21 talking?

22 A No.

23 Q So there were other people around --

24 A Right.

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1 Q -- to hear Kusinsky's statement?

2 A Right.

3 Q But you don't recall who those people
4 are as you sit here?

5 A No.

6 Q Do you know if they were male or
7 female, what rank they were, anything about them?

8 A They were mostly patrolmen, tact
9 officers, and the tact sergeant. And I don't
10 know which team it was, if it was my old team or
11 a different team.

12 Q And where specifically was this
13 conversation taking place?

14 A In the tactical offices in the 24th
15 District.

16 Q Which is where?

17 A Devon and Clark.

18 Q The statement that you made here: "He
19 further stated" -- and that's the "look at this
20 shit all because I fucked with Shannon and Danny
21 because O'Grady and Salemme told me to," that
22 part of the statement, was that made in a
23 different part of the conversation or was it sort
24 of all together?

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1 A It was sort of all together.

2 Q And at that -- and that statement, do
3 you know if there were any particular people who
4 heard that particular part of the statement?

5 A Whoever was there would have, you
6 know -- there was a whole bunch of things talked
7 about that day, and this was just a minor part.

8 Q Was there anything else about Shannon
9 and Danny or this lawsuit or any of that that was
10 talked about during that conversation that's not
11 mentioned here in paragraph 18?

12 A No. Because I don't think Kusinsky
13 knows any of those people.

14 Q You don't think Kusinsky knows Shannon
15 Spalding or Danny Echeverria?

16 A No, I don't think so.

17 Q But he knows Cesario?

18 A Right. I'm assuming he knows him.

19 Q And his statements to you were what he
20 said Cesario said to him; is that right?

21 A Right.

22 Q And you don't have any firsthand
23 knowledge about whether Cesario said any of those
24 things or not, do you?

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1 A No.

2 Q What's your relationship with Kusinsky
3 now?

4 A I haven't seen him. He got promoted.
5 I think he's a commander now. I haven't seen him
6 in a while.

7 Q If he were to say that these
8 statements were not true, would you be saying
9 that he was lying?

10 MR. SMITH: I'm just going to object to the
11 form of the question as it relates to what he
12 said to Mr. Koconis directly. Or are you asking
13 what --

14 MS. DAVIS: I can clear it up.

15 MR. SMITH: -- he said to him?

16 MS. DAVIS: That's no problem.

17 BY MS. DAVIS:

18 Q If Mr. Kusinsky said that he never
19 talked to you and he never said any statements
20 like this, would that be true?

21 A He might not recall it. I don't think
22 he would purposefully lie.

23 Q But if he says that he did not make
24 these statements, then --

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1 A That's his recollection. If I didn't
2 have this right in front of me, I wouldn't
3 remember this either.

4 MS. DAVIS: Give me two seconds. I think
5 that's all the questions that I have. Unless do
6 you have questions that you're going to be
7 asking?

8 MR. SMITH: Not at this point.

9 MS. DAVIS: Okay. Just give me two seconds.

10 (Recess from 4:16 p.m. to 4:18 p.m.)

11 BY MS. DAVIS:

12 Q I only have two questions, and it's
13 related to the last paragraph, paragraph 18. And
14 it's already been read into the record.

15 The last statement where it says,
16 "Look at all this shit all because I fucked with
17 Shannon and Danny because O'Grady and Salemme
18 told me to," was there any other conversation
19 about Salemme during this conversation?

20 A No.

21 Q Do you know Joe Salemme?

22 A No idea who he is.

23 Q Do you know whether Kusinsky knows
24 O'Grady or Salemme?

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1 A Nope.

2 Q And I just want to make sure I'm
3 clear. If Kusinsky says that these statements
4 are absolutely false, do you still stand by this
5 statement in paragraph 18?

6 MR. SMITH: Again, I'm just going to object
7 to the form. Are you asking in terms of what
8 Kusinsky said to Mr. Koconis or are you --

9 MS. DAVIS: Exactly.

10 MR. SMITH: -- asking about what was said to
11 Mr. Kusinsky?

12 BY MS. DAVIS:

13 Q I'm asking if Mr. Kusinsky reads this
14 and says, "I never said these things to Pete
15 Koconis," do you still stand by this
16 paragraph 18?

17 A Yeah. It was said. Maybe not that
18 specific exact words the way it's down, but it
19 was the generalization it says.

20 MS. DAVIS: Okay. No further questions.

21 MR. SMITH: No questions.

22 MS. DAVIS: So we are done.

23 MR. SMITH: Did they go over waiver of
24 signature?

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1 MS. DAVIS: Did they?

2 THE WITNESS: I'll waive my signature.

3 MS. DAVIS: Then you already know.

4 (Deposition concluded at 4:20 p.m.)

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1 UNITED STATES OF AMERICA)
2 NORTHERN DISTRICT OF ILLINOIS)
3 EASTERN DIVISION) SS:
4 STATE OF ILLINOIS)
5 COUNTY OF COOK)

6 I, Loretta A. Tyska, Certified Shorthand
7 Reporter and Registered Professional Reporter, do
8 hereby certify that PETER KOCONIS was first duly
9 sworn by me to testify to the whole truth and
10 that the above deposition was reported
11 stenographically by me and reduced to typewriting
12 under my personal direction.

13 I further certify that the said deposition
14 was taken at the time and place specified and
15 that the taking of said deposition commenced on
16 September 21, 2015, at 1:30 p.m.

17 I further certify that I am not a relative
18 or employee or attorney or counsel of any of the
19 parties, nor a relative or employee of such
20 attorney or counsel, nor financially interested
21 directly or indirectly in this action.

22 Witness my official signature on
23 this day, February 19, 2016.



24 LORETTA A. TYSKA, CSR, RPR, CLR

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